

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

FREEDOM COALITION OF DOCTORS FOR
CHOICE,

Plaintiff,

v.

CENTERS FOR DISEASE CONTROL AND
PREVENTION, AND U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES

Defendant.

Civil Action No. 2:23-cv-00102-Z

MOTION TO PROCEED WITHOUT LOCAL COUNSEL

Plaintiff seeks leave of the Court to proceed without local counsel and provides the following good cause to do so:

The undersigned counsel resides in and maintains his principal office in this District but does not live within 50 miles of the Amarillo Division courthouse. Counsel is from that area of Texas, however—having grown up in Lubbock and Midland—and is very familiar with Amarillo as well as traveling there from the Dallas area. Counsel has previously attended Court in the Amarillo Division and is able to attend any hearing scheduled by the Court in this case. Counsel will be present at all hearings even if local counsel were required and Plaintiff thus requests that the Court grant this motion to avoid costs associated with hiring additional counsel.

CONCLUSION

For the foregoing reasons, Plaintiff requests that the Court grant the motion to proceed without local counsel.

Dated: June 23, 2023

Respectfully submitted,

/s/ John C. Sullivan

John C. Sullivan

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* *pro hac vice* application pending

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2023, a true and correct copy of this Motion was served by CM/ECF on all counsel or parties of record.

/s/ John C. Sullivan
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CERTIFICATE OF CONFERENCE

Service copies have been sent to Defendants but there are no appearances yet for an attorney with whom counsel could conference this motion.

/s/ John C. Sullivan
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